

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMERICAN BROADCASTING COMPANIES,  
INC., DISNEY ENTERPRISES, INC., CBS  
BROADCASTING INC., CBS STUDIOS, INC.,  
NBCUNIVERSAL MEDIA, LLC, NBC  
STUDIOS, LLC, UNIVERSAL NETWORK  
TELEVISION, LLC, TELEMUNDO  
NETWORK GROUP LLC, and WNJU-TV  
BROADCASTING LLC,

Plaintiffs/Counterclaim  
Defendants,

v.

AEREO, INC.

Defendants.

WNET, THIRTEEN, FOX TELEVISION  
STATIONS, INC., TWENTIETH CENTURY  
FOX FILM CORPORATION, WPIX, INC.,  
UNIVISION TELEVISION GROUP, INC., THE  
UNIVISION NETWORK LIMITED  
PARTNERSHIP, and PUBLIC  
BROADCASTING SERVICE,

Plaintiffs/Counterclaim  
Defendants,

v.

AEREO, INC., f/k/a BAMBOOM LABS, INC.

Defendant/Counterclaim Plaintiff

Civ. Act. No. 12-CV-1540(AJN)

**MOTION FOR PRO HAC VICE  
ADMISSION OF MARKHAM C.  
ERICKSON**

Civ. Act. No. 12-CV-1543(AJN)

**MOTION FOR PRO HAC VICE  
ADMISSION OF MARKHAM C. ERICKSON**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Catherine Sarah Grealis, hereby move for an Order allowing the admission *pro hac vice* of Markham C. Erickson to appear as counsel for NetCoalition in the above-captioned action. I am a member in good standing of the bar of this Court and there are no pending disciplinary proceedings against me in any State or Federal court.

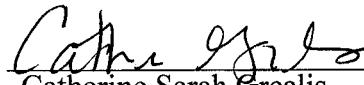
Mr. Erickson's contact information is as follows:

Applicant's Name:	Markham C. Erickson
Firm Name:	Holch & Erickson LLP
Address:	400 North Capital Street, NW
City/State/Zip:	Washington, DC 20001
Phone Number:	(202) 624-1460
Fax Number:	(202) 393-5218

Mr. Erickson is a member in good standing of the Bar of the State of Virginia. There are no pending disciplinary proceedings against Mr. Markham in any State or Federal court.

Date: May 11, 2012

Respectfully submitted,



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Catherine Sarah Grealis  
WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
cgerealis@wsgr.com  
Telephone (212) 999-5800  
Fax (212) 999-5899

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AEREO, INC., f/k/a BAMBOOM LABS, INC.

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Civ. Act. No. 12-CV-1540(AJN)

**AFFIDAVIT OF CATHERINE SARAH  
GREALIS IN SUPPORT OF MOTION  
FOR PRO HAC VICE ADMISSION  
OF MARKHAM C. ERICKSON**

Civ. Act. No. 12-CV-1543(AJN)

State of New York )  
                      )  
                      ss:  
County of New York )

Catherine Sarah Grealis, being duly sworn, hereby deposes and says as follows:

1. I am associated with the law firm of Wilson Sonsini Goodrich & Rosati, P.C. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Markham C. Erikson as counsel *pro hac vice* to represent NetCoalition in this matter.

2. I am a member in good standing of the bar of the State of New York, where I was admitted to practice law in 2010. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Erickson is a member of the law firm of Holch & Erickson, in Washington, DC. A true and correct copy of Mr. Erickson's Certificate of Good Standing is attached hereto as Exhibit "A".

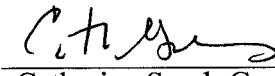
4. I believe Mr. Erickson to be a skilled attorney and of high moral character.

5. Accordingly, I am pleased to move the admission of Markham C. Erickson, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission *pro hac vice* of Markham C. Erickson, which is attached hereto as Exhibit "B".

WHEREFORE it is respectfully requested that the motion to admit Markham C. Erickson, *pro hac vice*, to represent NetCoalition in the above-captioned matter, be granted.

Date: May 11, 2012  
New York, New York

  
\_\_\_\_\_  
Catherine Sarah Grealis

Sworn to before me this  
11th day of May, 2012

  
\_\_\_\_\_  
Notary Public

LEE ANN ALMEIDA  
Notary Public, State of New York  
No. 01AL6226533  
Qualified in Nassau County  
Certificate Filed in New York County  
Commission Expires August 9, 2014

# **Exhibit A**



## VIRGINIA STATE BAR

### ***CERTIFICATE OF GOOD STANDING***

*THIS IS TO CERTIFY THAT MARKHAM CHO ERICKSON IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR*

*IN GOOD STANDING. MR. ERICKSON WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON OCTOBER 15, 1993,*

*AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

*Issued May 4, 2012*

A handwritten signature in cursive script that appears to read "Karen A. Gould".

KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

# **Exhibit B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Civ. Act. No. 12-CV-1540(AJN)

**ORDER FOR ADMISSION PRO HAC  
VICE ON WRITTEN MOTION**

Civ. Act. No. 12-CV-1543(AJN)

**ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of Catherine Sarah Greolis, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED THAT**

Applicant's Name:	Markham C. Erickson
Firm Name:	Holch & Erickson LLP
Address:	400 North Capital Street, NW
City/State/Zip:	Washington, DC 20001
Phone Number:	(202) 624-1460
Fax Number:	(202) 393-5218

is admitted to practice *pro hac vice* as counsel for NetCoalition in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. This action has been assigned to the Electronic Case Filing (ECF) system and as such, counsel shall immediately register for an ECF password.

Dated: May \_\_\_, 2012  
New York, New York

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United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2012, I caused a true and correct copy of the Motion for Pro Hac Vice Admission of Markham C. Erickson to be served via electronic mail on:

<b>Bruce P. Keller</b> Debevoise & Plimpton, LLP (NYC) 919 Third Avenue, 31st Floor New York, NY 10022 212 909-6000 Fax: 212 909-6836 Email: <a href="mailto:bpkeller@debevoise.com">bpkeller@debevoise.com</a> <b>ATTORNEY FOR PLAINTIFFS</b>	<b>Michael R. Potenza</b> Debevoise & Plimpton, LLP (NYC) 919 Third Avenue, 31st Floor New York, NY 10022 (212) 909-6000 Email: <a href="mailto:mpotenza@debevoise.com">mpotenza@debevoise.com</a> <b>ATTORNEY FOR PLAINTIFFS</b>
<b>Jennifer A. Golinveaux</b> Winston & Strawn LLP 101 California Street San Francisco, CA 94111 (415) 591-1000 Fax: (415) 591-1400 Email: <a href="mailto:jgolinveaux@winston.com">jgolinveaux@winston.com</a> <b>PRO HAC VICE</b> <b>ATTORNEY FOR DEFENDANT</b>	<b>John Clifford Englander</b> Goodwin Procter, L.L.P. Exchange Place, 53 State Street Boston, MA 02109 (617) 570-1000 Fax: (617) 523-1231 Email: <a href="mailto:jenglander@goodwinprocter.com">jenglander@goodwinprocter.com</a> <b>PRO HAC VICE</b> <b>ATTORNEY FOR DEFENDANT</b>
<b>Mark S. Puzella</b> Goodwin Procter, LLP (Boston) 53 State Street, Exchange Place Boston, MA 02109 (617) 570-1000 Fax: (617) 570-1231 Email: <a href="mailto:mpuzella@goodwinprocter.com">mpuzella@goodwinprocter.com</a> <b>PRO HAC VICE</b> <b>ATTORNEY FOR DEFENDANT</b>	<b>Michael S. Elkin</b> Winston & Strawn LLP (NY) 200 Park Avenue New York, NY 10166 (212)-294-6729 Fax: (212)-294-4700 Email: <a href="mailto:melkin@winston.com">melkin@winston.com</a> <b>ATTORNEY FOR DEFENDANT</b>
<b>R. David Hosp</b> Goodwin Procter, LLP (Boston) 53 State Street, Exchange Place Boston, MA 02109 (617)-570-1089 Fax: (617)-523-1231 Email: <a href="mailto:rhosp@goodwinprocter.com">rhosp@goodwinprocter.com</a> <b>ATTORNEY FOR DEFENDANT</b>	<b>Seth D Greenstein</b> Constantine Cannon LLP One Franklin Square 1301 K Street, NW, Suite 1050 East Washington, DC 20005 202-204-3514 Fax: (202) 204-3501 Email: <a href="mailto:sgreenstein@constantinecannon.com">sgreenstein@constantinecannon.com</a> <b>PRO HAC VICE</b> <b>ATTORNEY FOR DEFENDANT</b>


  
Catherine Sarah Greafis